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WELLS FARGO BANK, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ALICIA HERNANDEZ, et al., individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,

Defendant.

No. 3:18-cv-07354 WHA

**DECLARATION OF STACIE C. KNIGHT
IN SUPPORT OF DEFENDANT WELLS
FARGO BANK, N.A.'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Date: April 2, 2020

Time: 8:00 a.m.

Courtroom: 12

Judge: Hon. William H. Alsup

1 I, Stacie C. Knight, hereby declare, under penalty of perjury, as follows:

2 1. I am Of Counsel at Winston & Strawn LLP, counsel for Defendant Wells Fargo Bank,
3 N.A. (“Wells Fargo”) in this matter. I make this declaration based on my personal knowledge and in
4 support of Wells Fargo’s Motion for Partial Summary Judgment.

5 2. I am personally familiar with the facts set forth in this declaration. If called as a
6 witness, I could and would competently testify to the matters stated herein.

7 3. Attached as **Exhibit 1** is a true and correct copy of Exhibit 399 to the August 2, 2019
8 Wells Fargo 30(b)(6) Deposition of Carmen Bell.

9 4. Attached as **Exhibit 2** are true and correct copies of excerpts of the August 2, 2019
10 Wells Fargo 30(b)(6) Deposition of Carmen Bell.

11 5. Attached as **Exhibit 3** are true and correct copies of excerpts of the January 17, 2020
12 Deposition of Dan Salah.

13 6. Attached as **Exhibit 4** is a true and correct copy of the December 10, 2019 Deposition
14 of Sandra Campos.

15 7. Attached as **Exhibit 5** is a true and correct copy of Exhibit 502 to the December 10,
16 2019 Deposition of Sandra Campos.

17 8. Attached as **Exhibit 6** is a true and correct copy of Exhibit 503 to the December 10.
18 2019 Deposition of Sandra Campos.

19 9. Attached as **Exhibit 7** is a true and correct copy of Exhibit 507 to the December 10,
20 2019 Deposition of Sandra Campos.

21 10. Attached as **Exhibit 8** is a true and correct copy of Exhibit 509 to the December 10,
22 2019 Deposition of Sandra Campos.

23 11. Attached as **Exhibit 9** is a true and correct copy of Exhibit 510 to the December 10,
24 2019 Deposition of Sandra Campos.

25 12. Attached as **Exhibit 10** is a true and correct copy of Exhibit 513 to the December 10,
26 2019 Deposition of Sandra Campos.

27 13. Attached as **Exhibit 11** is a true and correct copy of Exhibit 514 to the December 10,
28

2019 Deposition of Sandra Campos.

14. Attached as **Exhibit 12** is a true and correct copy of Exhibit 520 to the December 10, 2019 Deposition of Sandra Campos.

15. Attached as **Exhibit 13** is a true and correct copy of Exhibit 523 to the December 10, 2019 Deposition of Sandra Campos.

16. Attached as **Exhibit 14** is a true and correct copy of Exhibit 525 to the December 10, 2019 Deposition of Sandra Campos.

17. Attached as **Exhibit 15** are true and correct copies of excerpts of the January 13, 2020 Deposition of Derrick Cannon.

18. Attached as **Exhibit 16** is a true and correct copy of Exhibit 1273 to the January 13, 2020 Deposition of Derrick Cannon.

19. Attached as **Exhibit 17** are true and correct copies of excerpts of the December 10, 2019 Deposition of Jerry Dela Cruz.

20. Attached as **Exhibit 18** is a true and correct copy of Exhibit 604 to the December 10, 2019 Deposition of Jerry Dela Cruz.

21. Attached as **Exhibit 19** are true and correct copies of excerpts from the December 20, 2019 Deposition of Ruben Abel Gallardo.

22. Attached as **Exhibit 20** is a true and correct copy of Exhibit 1127 to the December 20, 2019 Deposition of Ruben Arel Gallardo.

23. Attached as **Exhibit 21** are true and correct copies of excerpts from the January 3, 2020 Deposition of Kimberly Gladman.

24. Attached as **Exhibit 22** is a true and correct copy of Exhibit 1234 to the January 3, 2020 Deposition of Kimberly Gladman.

25. Attached as **Exhibit 23** are true and correct copies of excerpts from the December 12, 2019 Deposition of Charles Gomez.

26. Attached as **Exhibit 24** is a true and correct copy of Exhibit 1004 to the December 12, 2019 Deposition of Charles Gomez.

27. Attached as **Exhibit 25** are true and correct copies of excerpts from the December 11, 2019 Deposition of Jameel Hayden.

28. Attached as **Exhibit 26** is a true and correct copy of Exhibit 703 to the December 11, 2019 Deposition of Jameel Hayden.

29. Attached as **Exhibit 27** are true and correct copies of excerpts from the January 9, 2020 Deposition of Jason Hewitt.

30. Attached as **Exhibit 28** is a true and correct copy of Exhibit 1253 to the January 9, 2020 Deposition of Jason Hewitt.

31. Attached as **Exhibit 29** are true and correct copies of excerpts from the January 24, 2020 Deposition of Elizabeth Messana.

32. Attached as **Exhibit 30** is a true and correct copy of Exhibit 1625 to the January 24, 2020 Deposition of Elizabeth Messana.

33. Attached as **Exhibit 31** are true and correct copies of excerpts from the January 13, 2020 Deposition of Martha Montenegro.

34. Attached as **Exhibit 32** is a true and correct copy of Exhibit 1304 to the January 13, 2020 Deposition of Martha Montenegro.

35. Attached as **Exhibit 33** are true and correct copies of excerpts from the December 16, 2019 Deposition of Donna Perreault.

36. Attached as **Exhibit 34** are true and correct copies of excerpts from the January 17, 2020 Deposition of Joseph Plescia.

37. Attached as **Exhibit 35** is a true and correct copy of Exhibit 1527 to the January 17, 2020 Deposition of Joseph Plescia.

38. Attached as **Exhibit 36** are true and correct copies of excerpts from the January 22, 2020 Deposition of Anna Schulke.

39. Attached as **Exhibit 37** is a true and correct copy of Exhibit 1551 to the January 22, 2020 Deposition of Anna Schulke.

40. Attached as **Exhibit 38** are true and correct copies of excerpts from the December 17,

2019 Deposition of Scott Seymour.

41. Attached as **Exhibit 39** is a true and correct copy of Exhibit 1183 to the December 17, 2019 Deposition of Scott Seymour.

42. Attached as **Exhibit 40** are true and correct copies of excerpts from the January 28, 2020 Deposition of Hortensia Torres.

43. Attached as **Exhibit 41** is a true and correct copy of Exhibit 1643 to the January 28, 2020 Deposition of Hortensia Torres.

44. Attached as **Exhibit 42** is a true and correct copy of the July 10, 2019 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

45. Attached as **Exhibit 43** is a true and correct copy of Exhibit 344 to the July 10, 2019 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

46. Attached as **Exhibit 44** is a true and correct copy of Exhibit 345 to the July 10, 2019 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

47. Attached as **Exhibit 45** is a true and correct copy of Exhibit 346 to the July 10, 2019 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

48. Attached as **Exhibit 46** is a true and correct copy of Exhibit 351 to the July 10, 2019 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

49. Attached as **Exhibit 47** is a true and correct copy of Exhibit 352 to the July 10, 2019 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

50. Attached as **Exhibit 48** is a true and correct copy of Exhibit 358 to the July 10, 2019 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 20th day of February 2020.

/s/ Stacie C. Knight
Stacie C. Knight